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Attorneys for Defendant NGM Insurance Company

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF ARIZONA**

Salram Enterprises, LLC, an Arizona limited  
liability company,

Plaintiff,

v.

NGM Insurance Company, a Florida  
corporation,

Defendant.

Case No.

**NGM'S NOTICE OF REMOVAL**

Defendant NGM Insurance Company ("NGM"), by and through counsel undersigned, submits this Notice of Removal pursuant to 28 U.S.C. § 1446(a) and provides the following grounds for removal.

1. This matter was commenced in the Superior Court of the State of Arizona in and for the County of Maricopa on July 24, 2018 with the filing of a Complaint, Certificate of Arbitration, and Demand for Jury Trial.

2. The Summons, Affidavit of Service, Complaint, Certificate of Arbitration, Civil Cover Sheet, and Demand for Jury Trial constitutes all process and proceedings filed and served on NGM in the case, copies of which are attached hereto at Exhibit A.

3. Defendant NGM is a subsidiary of The Main Street American Group, Inc., a domestic insurance holding corporation with its principal place of business and citizenship in the State of Florida.

1           4.     Plaintiff Salram Enterprises, LLC is a resident of the State of Arizona (*see*  
2     Complaint, attached as Exhibit A).

3           5.     This action is one over which the United States District Courts have  
4     jurisdiction pursuant to 28 USC § 1332, by reason of the diversity of the citizenship of the  
5     parties.

6           6.     Defendant NGM has not pled, answered, or otherwise appeared in this  
7     action.

8           7.     Defendant NGM has filed this Notice within 30 days after receipt of the  
9     initial pleading setting forth the claim for relief upon which the action is based, and within  
10    one year after the commencement of the action. Removal is therefore timely pursuant to  
11    28 U.S.C. § 1446(b).

12          8.     The amount in controversy exceeds the requisite \$75,000. (*See* Complaint,  
13    attached as Exhibit A).

14          9.     A copy of this Notice is being filed with the Clerk of the Superior Court of  
15    the State of Arizona in and for the County of Maricopa.

16          WHEREFORE, Defendant NGM respectfully requests that this action be removed  
17    from the Superior Court of Arizona in and for the County of Maricopa to the United States  
18    District Court for the District of Arizona, and that further proceedings in the Superior  
19    Court of Arizona regarding the action be stayed pursuant to 28 U.S.C. § 1446.

20                 Dated on August 22, 2018.

21                                 GRAIF BARRETT & MATURA, P.C.

22  
23                                 By: /s/ Kevin C. Barrett  
24   Kevin C. Barrett  
25   Amanda J. Taylor  
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27   Suite 100  
28   Scottsdale, Arizona 85258  
                                       Attorneys for Defendant NGM Insurance  
                                       Company

**CERTIFICATE OF SERVICE**

I hereby certify that on August 22, 2018, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF system for filing and that a copy of same was deposited for mailing, first class mail, postage prepaid, to the following:

Kesha A. Hodge  
**MERLIN LAW GROUP, P.A.**  
2999 N. 44<sup>th</sup> Street, Suite 520  
Phoenix, Arizona 85018  
*Attorney for Plaintiff*

/s/ Carolyn J. Harrington